

KRIEGER LEWIN LLP

350 Fifth Avenue, 77th Floor
New York, NY 10118

Telephone: (212) 390-9550
www.KriegerLewin.com

May 6, 2024

By ECF

The Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Dhirenkumar Patel, 22 Cr. 369 (VSB)*

Dear Judge Broderick:

We represent Dhirenkumar Patel in the above-captioned case. We write to respectfully request permission to redact certain portions of Mr. Patel's publicly filed sentencing memorandum and accompanying exhibits and to file the unredacted versions under seal. Our proposed redactions consist of: (1) the contact information of non-parties;¹ (2) the names of minors;² and (3) information concerning Mr. Patel's health, as well as the health and other sensitive family matters of non-parties.³

¹ See *United States v. Johnson*, No. 16 Cr. 457 (NGG), 2018 WL 1611371, at *2 (E.D.N.Y. Apr. 3, 2018) (permitting redactions of the "contact information" of non-parties from sentencing materials); *United States v. Nallani*, No. 11 Cr. 20365 (VAR), 2016 WL 4138227, at *4 (E.D. Mich. Aug. 3, 2016) (permitting redaction of "email addresses and phone numbers" from sentencing materials); see also *Dodona I, LLC v. Goldman, Sachs & Co.*, 119 F. Supp. 3d 152, 156 (S.D.N.Y. 2015) (permitting redaction of "sensitive personal information . . . including home addresses, biographical information, telephone numbers and compensation"); *Cohen v. Gerson Lehrman Grp., Inc.*, No. 09 Civ. 4352 (PKC), 2011 WL 4336679, at *2 (S.D.N.Y. Sept. 15, 2011) (permitting redaction of "individual contact information, such as e-mail addresses, home addresses and phone numbers" from summary judgment materials).

² See Fed. R. Crim. P. 49.1(a).

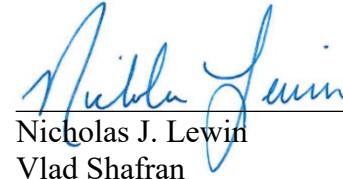
³ See *United States v. Erie Cty., N.Y.*, 763 F.3d 235, 244 n.8 (2d Cir. 2014) (approving the redaction of "medical information" from judicial documents); *Johnson*, 2018 WL 1611371, at *3 (permitting redactions of "highly personal and sensitive information" about non-parties from sentencing materials); *United States v. Sattar*, 471 F. Supp. 2d 380, 388 (S.D.N.Y. 2006) (permitting redactions to psychiatric report submitted in connection with sentencing that disclosed "highly personal family matters").

We have included three versions of Mr. Patel's sentencing materials: (1) the original, unredacted version; (2) a redacted version; and (3) a version that outlines the proposed redactions.

We thank the Court for its consideration of this request.

Respectfully submitted,
KRIEGER LEWIN LLP

By:


Nicholas J. Lewin
Vlad Shafran

cc: AUSA Noah Solwiejczyk (by ECF)